

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA COUNTY**

R. ALEXANDER ACOSTA, SECRETARY OF  
LABOR, UNITED STATES DEPARTMENT OF  
LABOR

NO. 1:19-cv-00372-CCC

VS

Aa TO Zz CHILD CARE AND LEARNING  
CENTER, INC., ASHLEIGH ZIMMERMAN and  
RYAN ZIMMERMAN

**DEFENDANTS', Aa TO Zz CHILD CARE AND LEARNING CENTER, INC., ASHLEIGH ZIMMERMAN  
and RYAN ZIMMERMAN, INITIAL FEDERAL DISCLOSURES PURSUANT TO RULE 26**

**(a) REQUIRED DISCLOSURES (1)(A):**

The following individuals have information concerning the facts and circumstances in regard to the claims of the Plaintiff:

1. Ryan Zimmerman and Ashleigh Zimmerman - Officers, c/o Aa to Zz Child Care and Learning Center, Inc.
2. Syndi Wamsher, Director of Human Resources, c/o Aa to Zz Child Care and Learning Center, Inc.
3. Maryanne Huzvar, Regional Director, c/o Aa to Zz Child Care and Learning Center, Inc.
4. Amanda Schwabb, Regional Director, c/o Aa to Zz Child Care and Learning Center, Inc.
5. Rocio Torres-Solano, Investigator, c/o Department of Labor
6. Jo-Ann Gregory, Assistant District Director, c/o Department of Labor

**(b) REQUIRED DISCLOSURES (1)(B):**

1. Defendants' wage-payroll records from 2015 to 2019 provided by Aa to Zz Child Care and Learning Center, Inc. (previously produced).
2. Documents concerning Defendants' "Procare" time management system (to be produced).
3. Defendants are continuing their search for additional wage-payroll information for the years in question which will be supplemented during this litigation.

**(c) REQUIRED DISCLOSURES (1)(C):**


See Department of Labor's disclosures.

**(d) REQUIRED DISCLOSURES (1)(D):**

Defendants do have a small \$25,000 endorsement of its general liability policy which is applicable to this loss, however, said \$25,000 coverage amount is being eroded by defense costs.

NAULTY, SCARICAMAZZA & McDEVITT, LLC.

BY:



GERARD X. SMITH, ESQUIRE  
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One Penn Center, Suite 750  
Philadelphia, PA 19103  
(215) 568-5116  
Identification Numbers: 40927 & 314978

Attorneys for Defendants,  
Aa to Zz Child Care and Learning Center, Inc., Ashleigh  
Zimmerman and Ryan Zimmerman


**CERTIFICATE OF SERVICE**

I, Gerard X. Smith, Esquire, hereby certify that on June 26, 2019, Defendants' Initial Federal Disclosures Pursuant to Rule 26 was served upon all opposing counsel and/or parties, via U.S. Mail, First Class, postage prepaid, addressed as follows:

Maria del Pilar Castillo, Esquire  
Office of the Solicitor, Region III  
U.S. Department of Labor  
170 S. Independence Mall West  
Suite 630E, The Curtis Center  
Philadelphia, PA 19106-3306

NAULTY, SCARICAMAZZA & McDEVITT, LLC.

BY:

  
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